

COMPLAINT

(for filers who are prisoners without lawyers)

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

JULIUS C. GARRISON

v.

Case Number:

(Full name of defendant(s))

JOSEPH BEAHM

KYLE TRITT

JEREMY STANEIC, CO RUSSELL, CO BERNHE

LT. MITCHELL, BRIAN FOSTER, CO LEOPOLD

(to be supplied by Clerk of Court)

A. PARTIES

1. Plaintiff is a citizen of WISCONSIN, and is located at
(State)

WAUPUN Correctional Institution, P.O. Box 351, Waupun, WI 53983
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant JOSEPH BEAHM, KYLE TRITT, JEREMY STANEIC, BRIAN FOSTER, LT MITCHELL
(Name)

is (if a person or private corporation) a citizen of WISCONSIN, USA

and (if a person) resides at UNKNOWN (State, if known)
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for WAYPUN CORRECTIONAL INSTITUTION
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

I Plaintiff JULIUS GARRISON is Housed At WAYPUN Correctional Institution As A INMATE. ON 04/30/20 Sargeant Joseph BETHM had CO Gline and CO DAVESE place me in an observation cell that had Another Person's Fecal MATTER ON the toilet in the cell and Another Person's URINE ON the floor of the cell. I (JULIUS GARRISON) informed several security staff members about the condition I WAS living in in that OBS cell with the feces and the urine in there. I informed Kyle TRITT ON 05/1/20, Lt Mitchell ON 04/30/20, Lt STANEIC; CO Leopold and CO Russell about the Fecal matter on the toilet in the cell and about the urine on the floor of the cell. None of these staff members even Attempted to pull me out of the OBS cell to get it cleaned up. I WAS in that OBS cell for four Days from 04/30/20 through 05/1/20.

I believe my 8th Amendment was violated in this incident. This was an act of torture by the BHU staff. Joseph Beahm, CO Gline, CO DAVESE, put me at risk to catch a staff infection, MRSA and other infectious diseases. THE BHU Security Staff members Kyle Tritt, Thomas Mitchell, Jeremy Stancic and JOSEPH BEAHM deliberately REFUSED TO CLEAN the CONTAMINATED OBSERVATION cell that I (Julius Garrison) was in, ignoring the risk of staff infection and MRSA. For NO valid reason. Because of these circumstances, I GARRISON am traumatized from smelling the feces and the bodily fluids that was in the cell. I (GARRISON) am seeking compensation for the DECLINE of my mental health since the incident happened. I was forced to defecate in the shower for 4 days in cell A 227 BHU. I could not use the toilet in the cell because of the fecal matter on the seat of the toilet.

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I wish to BE AWARDED the Amount of \$100,000.00 and I WANT to be moved to another MAX institution where the Security Staff Honors the Federal Rules And Regulations. I don't feel safe Here at Waupun Correctional Institution. I wish that the Amount of \$100,000.00 be divided from Each Defendant included in this Complaint.

E. JURY DEMAND

I want a jury to hear my case.

☐ - YES

☒ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 5th day of JUNE 2020.

Respectfully Submitted,

James Harrison
Signature of Plaintiff

547211
Plaintiff's Prisoner ID Number

WAUPUN Correctional Institution
P.O. Box 351 Waupun, WI 53983
(Mailing Address of Plaintiff)



expires
9-26-20
Kathy
G.
6-5-20

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE



I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.



I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.